

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

IN THE MATTER OF THE SEARCH OF)	
a white envelope Postmarked Saint Louis, MO)	No. 1:19MJ4271ACL
15 October, 2019, addressed to Kalin Thomas)	
# 13281130, HU 3C13, 18701 Old Highway 66,)	FILED UNDER SEAL
MDCC, Pacific, MO.)	

MOTION FOR CONTINUED SEALING OF
SEARCH WARRANT DOCUMENTS

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Timothy J. Willis, Assistant United States Attorney for said District, and moves this Court for an order directing that the seizure warrant, along with its application, affidavit, and return, entered by this Court continue to be sealed until June 4, 2020, except for the limited purposes of providing same to defense counsel pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure.

In support of this Motion, the Government provides the following facts, establishing that (a) the government has a compelling interest in sealing the documents in question which outweighs the public's qualified First Amendment right of access to review those documents; and (b) no less restrictive alternative to sealing is appropriate or practical:

The investigation is on-going and disclosure of the contents of the seizure warrant could compromise the investigation. In addition, the initial target has not yet been charged and his privacy interests would be harmed by premature disclosure.

WHEREFORE, for the reasons stated above, the Government respectfully requests that the seizure warrant, along with its application, affidavit, and return, continue to be sealed until June 4, 2020.

Dated this ____ day of February, 2020.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Timothy J. Willis
Timothy J. Willis, #62428MO
Assistant United States Attorney